

NOSB Pasture Guidance
**** Forage Producers ****

May 20, 2005

National Organic Standards Board
c/o Arthur Neal
Room 4008 — South Building
1400 and Independence Avenue SW
Washington, DC 20250-0001

Dear Mr. Neal;

I am writing in response to the NOSB "Guidance for Interpretation of section 205.239(a)(2) of the National Organic Program," published for public comment on March 22.

I am against certain portions of the language of Sections (A) and (C), and I am in favor of the language in section (B).

The restrictions of sections (A) and (C) may slow down the growth, or cause the loss of organic dairy in my area, and this concerns me. These restrictions would have a negative effect on the sales of my high-quality forage crops to dairy customers. I wish to see my business expand, but I believe this clause would harm other organic forage growers and myself.

I am against two parts of the wording in Section (A). The specific requirement of 30% dry matter intake on a daily basis during the growing season but not less than 120 days is unreasonable to me. I supply alfalfa, wheat, and grain to several organic dairies. I have experience with many different climates, soils and farm management plans. Individual farms need the freedom to create specific management plans that fit the location of the farm. That is what I do with my certifier and with my organic farm. Never would I dictate arbitrary number to other organic farmers, nor would I wish to receive them.

I am also not in agreement with the five reporting requirements of this section. Since organic farms are already required to do extensive reporting on how the farm will be managed, I do not believe that additional reporting would be beneficial to the organic program or the farmers. These five requirements are not measurable or workable. They impose additional record-keeping burdens on farm plans that are already filled with time-consuming reporting requirements.

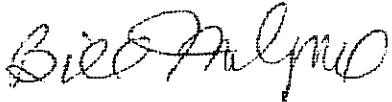
In Section (C), I do not think the use of the National Resources Conservation Service to regulate dairy animal grazing is wise. The NRCS is only used for beef cattle, not dairy in my county. Others raising livestock that I have spoken with agree that the NRCS is not a good way to manage dairy pastures. The animals only travel to and from a barn several

times a day as compared to the cow-calf operations, where animals roam for weeks or months at a time which is what the NRCS is used for.

Section (B) seems reasonable to me, since dairy animals should be outside as much as possible as well as have access to a pasture.

Thank you for your time.

Sincerely,

A handwritten signature in cursive script that reads "Bill Molyneux". The signature is fluid and written in dark ink.

Bill Molyneux

Molyneux Farms